REMARKS/ARGUMENTS

1. Claim Amendments

Claims 23-25, 27-33 and 35-44 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2. Claim Rejections – 35 U.S.C. § 103(a)

Claims 23-25, 29-33, 37-39, 41-44 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kuhn, US Patent No. 6,961,567 (Kuhn) and further in view of Allor, US Patent Application No. 2003/0226102 (Allor). The amendments to Claims 23 and 32 clearly distinguish the present invention from the combination of Kuhn and Allor. Support for these amendments can be found at least at paragraphs [0054]-[0059] of the Specification:

> [0054] The plug-in supports all of the application software mechanisms supported by the platform assembly, and complies with the application model defined in the platform assembly. In other words, the plug-in will adhere to the same paradigm(s) as the provided OPA services exported by the Open Platform API. These include, but are not limited to:
>
> [0055] Component model compliance in terms of how interfaces and components are defined and operate. The plug-in is implemented as a component and will provide its services to end-product application software through a defined function or method based interface.
>
> [0056] Naming convention compliance. The plug-in uses the same naming convention for the interface methods as the Open Platform API. Also both the parameters and types defined in these interface methods will comply with the naming conventions used in the Open Platform API.
>
> [0057] Undesired-event handling compliance. The plug-in will handle possible erroneous behavior of the functionality in the same way as the platform. Information about such errors will be delivered to the application software according to the same paradigm as in the Open Platform API.
>
> [0058] Message model compliance. The plug-in will support two modes for delivering results from asynchronous requests, call back, and full message mode services.

[0059] object and interface based paradigm.

As previously noted, Kuhn is conceptually different from the present invention in that Kuhn describes a plug-in for replacing physical layer technologies, for example, from GSM to CDMA, etc. In contrast, in the present invention a plug-in is used to extend services provided by the mobile terminal platform, more specifically by the software services component which resides on the higher layers. This is clear from page 10 of the present application which provides: "The layers of the software services component 22 include an application service layer 80 to provide application services..."

It can be seen that the application domain software of the present invention is different from the functionality which Kuhn replaces. In the description of the present application "application software" is any software that provides the functionality that users may wish to have available. This clearly refers to application domain software that resides in the higher layer services. On the other hand, Kuhn clearly is not directed to applications on the mobile terminal, but rather, changes in functionality that allow a handset to operate on different wireless networks.

Allor fails to overcome the deficiencies of Kuhn. Allor relates to displaying content in browser-embedded windows on an Internet connected personal computer, and more particularly to a system and method for enabling plug-in modules to display content within a browser-enabled window and receive callbacks from controls embedded within the content in a standardized manner. Allor does not refer to, nor is it applicable to, a mobile terminal platform domain having a software services component for providing functionality. Whereas, in the present invention, the mobile terminal platform domain has an interface component having at least one interface for providing access to the functionality of the software services component for enabling an application domain software to be installed, loaded and run in said mobile terminal platform, neither Kuhn nor Allor focus on, nor provide any information about the interface between their respective platform and any software services component.

The proposed combination of the Kuhn and Allor would change the principle of operation of the prior art inventions being modified, hence the teachings of the references are not sufficient to render the claims obvious. In the case of *In re Ratti, 270*

F.2d 810, 123 USPQ 349 (CCPA 1959)), the court reversed the rejection of a patent application holding the "suggested combination of references would require a substantial reconstruction and redesign of the elements shown in [the primary reference] as well as a change in the basic principle under which the [primary reference] construction was designed to operate." Such would be the case here with Kuhn and Allor.

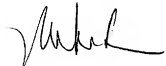
Claims 27-28, 35-36, and 40 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kuhn and Allor, and further in view of Stewart et al, US Pub N: 2001/0039570 (hereinafter Stewart). For the reasons set forth above, the combination of Kuhn and Allor fail to disclose or suggest features of the invention as claimed in the base claims of claims 27-28, 35-36, and 40. Stewart fails to overcome the deficiencies of Kuhn and Allor.

CONCLUSION

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 23-25, 27-33 and 35-44.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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Michael Cameron
Registration No. 50,298

Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024

(972) 583-4145
michael.cameron@ericsson.com